

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDAL RICHARDSON, et al.)	
)	
Defendants.)	

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S SECOND
REQUEST FOR ADMISSIONS**

Come now Defendants Reliable Heat & Air, LLC and Randall Richardson, in response to Plaintiff's David Stebbins, second request for admissions and state as follows:

1. In the month of November 2009, the Plaintiff approached Rita Stebbins, the mother of the Plaintiff, at her place of occupation at the time, and sought her help in locating a therapist.

Reply: Defendants have no knowledge concerning this request and therefore deny same.

2. The reason the Plaintiff wanted this therapist is because, not ten minutes prior, he was literally preparing a suicide note.

Reply: Defendants have no knowledge concerning this request and therefore deny same.

3. The reason the Plaintiff was preparing this suicide note is because he was

being harassed by creditors and debt collectors.

Reply: Defendants have no knowledge concerning this request and therefore deny same.

4. These debt collectors were aggrieved by the Plaintiff's inability to pay his debts.

Reply: Defendants have no knowledge concerning this request and therefore deny same.

5. The Plaintiff's inability to pay these debts stemmed directly from his unemployment.

Reply: Defendants have no knowledge concerning this request and therefore deny same.

6. The Plaintiff's unemployment was caused by the Defendants; very termination of employment, spoken of in the complaint.

Reply: Defendants have no knowledge concerning this request and therefore deny same.


Randall Richardson

Reliable Heat & Air LLC


by: Randall Richardson Member

VERIFICATION

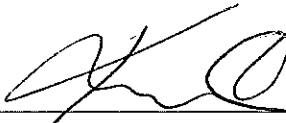
STATE OF MISSOURI)
) ss
COUNTY OF TANEY)

On this 5th day of January 2011, Randall Richardson personally and as Member

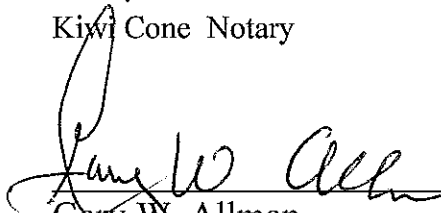
of Reliable Heat & Air LLC, defendants herein, being duly sworn, upon his oath states that the facts and matters contained in the above reply to request for admissions are true and correct according to his best knowledge and belief.



KIWI K. CONE
My Commission Expires
June 25, 2013
Stone County
Commission #09828728



Kiwi Cone Notary



Gary W. Allman
Missouri Bar No. 19921
P.O. Box 5049
Branson, Missouri 65615
Phone: (417) 332-2800
Fax No: (417) 332-1008
ATTORNEY FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
SECOND REQUEST FOR PRODUCTIONS**

COME NOW, Defendants Reliable Heat & Air, LLC and Randall Richardson, and respond to Plaintiff's Second Request for Production, as follows:

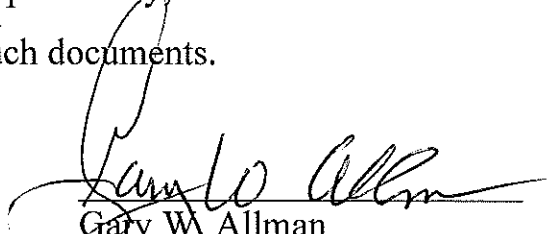
1. Copies of all the contracts – every single last one of them – that Richardson has had with repeat customers, within the last two years. It is necessary to go back two years, rather than one year, because I was employed by Richardson well over a year ago.

Response: Defendants object to producing copies of every single contract they have with repeat customers. Each of these agreements is a lengthy document which by its terms includes confidential financial information concerning the Defendant and each of its customers and also contains confidential information concerning Defendants' business, all of which is proprietary information which Defendants never disclose to others.

Such information is not relevant to any issue in this litigation between Plaintiff and Defendants, thus Plaintiff's request is overbroad and is not likely to lead to the discovery of relevant evidence.

2. Please submit documentation of when I told Richardson about my Aspergers, and, above all, what, specifically, I told him.

Response: There are no such documents.

A handwritten signature in black ink, appearing to read "Gary W. Allman", is written over a horizontal line.

Gary W. Allman

Missouri Bar No. 19921

P.O. Box 5049

Branson, Missouri 65615

Phone: (417) 332-2800

Fax No: (417) 332-1008

ATTORNEY FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
THIRD REQUEST FOR PRODUCTION**

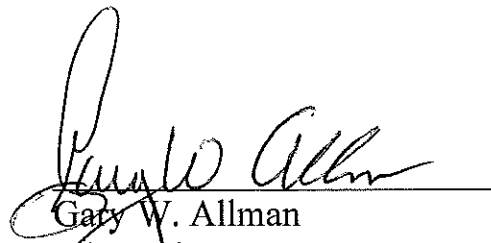
COME NOW, Defendants Reliable Heat & Air, LLC and Randall Richardson, and respond to Plaintiff's Third Request for Production, as follows:

1. One copy of the employee handbook at Reliable Heat & Air, LLC, as it was written in the months of May and June, 2009.

Response: Such document has previously been produced in Defendants' Response to Plaintiff's First Request for Production of Documents.

2. One copy of the contract that I signed, signifying that I have read and understand the company handbook.

Response: Such document has previously been produced in Defendants' Response to Plaintiff's First Request for Production of Documents.

A handwritten signature in black ink, appearing to read "Gary W. Allman", is written over a horizontal line.

Gary W. Allman

Missouri Bar No. 19921

P.O. Box 5049

Branson, Missouri 65615

Phone: (417) 332-2800

Fax No: (417) 332-1008

ATTORNEY FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of:

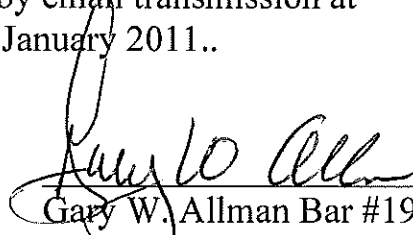
Defendants' Response to Plaintiff's Second Request for Admissions.
Defendants' Response to Plaintiff's Second Request for Production.
Defendants' Response to Plaintiff's Third Request for Production.

Was served upon:

David Stebbins
1407 N Spring Rd. Apt #5
Harrison, AR 72601
Email: stebbinsd@yahoo.com

- () by delivering a copy to him;
- () by leaving a copy at his office with his clerk;
- () by leaving a copy at his office with an attorney associated with him;
- (x) by mailing a copy to him, as prescribed by law;

(x) by transmitting a copy to them by email transmission at
stebbinsd@yahoo.com on the 5th day of January 2011..


Gary W. Allman Bar #19921
P.O. Box 5049
Branson, Mo 65615
Phone: (417) 332-2800
Fax: (417) 332-1008
garywallman@gmail.com
Attorney for: Defendants